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UNITED STATES DISTRICT COURT OF NEW JERSEY

C.G.B.,

Plaintiff,

v.

: CIVIL ACTION NO.:
: 2:15-CV-03401-SRC-CLW

: **ANSWER AND AFFIRMATIVE
DEFENSES**

AIDA SANTA LUCIA, VAROUJAN :
KHOROZIAN, KYLE KHOROZIAN, DEREK :
KHOROZIAN and JOHN DOES 1-5 (being agents :
servants and employees of defendants as a :
continuing investigation may reveal who are :
fictitiously named because their true identities :
are unknown),

Defendants.

:

Defendants, Aida Santa Lucia, Varoujan Khorozian, Kyle Khorozian and Derek Khorozian , by way of Answer to Plaintiff's (hereinafter "Defendants") Complaint says:

INTRODUCTION

1. Defendants deny the allegations contained in Paragraph one of the Plaintiff's Complaint.
2. Defendants neither admit nor deny the allegations contained in Paragraph two of the Plaintiff's Complaint and leaves the plaintiff to her proofs.
3. Defendants deny the allegations contained in Paragraph three of the Plaintiff's Complaint.

4. Defendants deny the allegations contained in Paragraph four of the Plaintiff's Complaint.
5. Defendants neither admit nor deny the allegations contained in Paragraph five of the Plaintiff's Complaint and leave the plaintiff to her proofs.
6. Defendants neither admit nor deny the allegations contained in Paragraph six of the Plaintiff's Complaint and leave the plaintiff to her proofs.
7. Defendants neither admit nor deny the allegations contained in Paragraph seven of the Plaintiff's Complaint and leave the plaintiff to her proofs.
8. Defendants neither admit nor deny the allegations contained in Paragraph eight of the Plaintiff's Complaint and leave the plaintiff to her proofs.
9. Defendants neither admit nor deny the allegations contained in Paragraph nine of the Plaintiff's Complaint and leave the plaintiff to her proofs.
10. Defendants neither admit nor deny the allegations contained in Paragraph ten of the Plaintiff's Complaint and leave the plaintiff to her proofs.
11. Defendants deny the allegations contained in Paragraph eleven of the Plaintiff's Complaint.
12. Defendants neither admit nor deny the allegations contained in Paragraph twelve of the Plaintiff's Complaint and leave the plaintiff to her proofs.
13. Defendants neither admit nor deny the allegations contained in Paragraph thirteen of the Plaintiff's Complaint and leave the plaintiff to her proofs.
14. Defendants deny the allegations contained in Paragraph fourteen of the Plaintiff's Complaint.

15. Defendants deny the allegations contained in Paragraph fifteen of the Plaintiff's Complaint.
16. Defendants deny the allegations contained in Paragraph sixteen of the Plaintiff's Complaint.
17. Defendants deny the allegations contained in Paragraph seventeen of the Plaintiff's Complaint.
18. Defendants deny the allegations contained in Paragraph eighteen of the Plaintiff's Complaint.
19. Defendants deny the allegations contained in Paragraph nineteen of the Plaintiff's Complaint.
20. Defendants deny the allegations contained in Paragraph twenty of the Plaintiff's Complaint.
21. Defendants deny the allegations contained in Paragraph twenty-one of the Plaintiff's Complaint.
22. Defendants deny the allegations contained in Paragraph twenty-two of the Plaintiff's Complaint.
23. Defendants deny the allegations contained in Paragraph twenty-three of the Plaintiff's Complaint.
24. Defendants deny the allegations contained in Paragraph twenty-four of the Plaintiff's Complaint.
25. Defendants deny the allegations contained in Paragraph twenty-five of the Plaintiff's Complaint.

26. Defendants deny the allegations contained in Paragraph twenty-six of the Plaintiff's Complaint.
27. Defendants neither admit nor deny the allegations contained in Paragraph twenty-seven of the Plaintiff's Complaint and leave the plaintiff to her proofs.
28. Defendants neither admit nor deny the allegations contained in Paragraph twenty-eight of the Plaintiff's Complaint and leave the plaintiff to her proofs.
29. Defendants neither admit nor deny the allegations contained in Paragraph twenty-nine of the Plaintiff's Complaint and leave the plaintiff to her proofs.

BACKGROUND

30. Defendants deny the allegations contained in Paragraph thirty of the Plaintiff's Complaint.
31. Defendants deny the allegations contained in Paragraph thirty-one of the Plaintiff's Complaint.
32. Defendants neither admit nor deny the allegations contained in Paragraph thirty-two of the Plaintiff's Complaint and leave the plaintiff to her proofs.
33. Defendants neither admit nor deny the allegations contained in Paragraph thirty-three of the Plaintiff's Complaint and leave the plaintiff to her proofs.
34. Defendants neither admit nor deny the allegations contained in Paragraph thirty-four of the Plaintiff's Complaint and leave the plaintiff to her proofs.
35. Defendants neither admit nor deny the allegations contained in Paragraph thirty-five of the Plaintiff's Complaint and leave the plaintiff to her proofs.
36. Defendants neither admit nor deny the allegations contained in Paragraph thirty-six of the Plaintiff's Complaint and leave the plaintiff to her proofs.

JURISDICTION AND VENUE

37. Defendants neither admit nor deny the allegations contained in Paragraph thirty-seven of the Plaintiff's Complaint and leave the plaintiff to her proofs.
38. Defendants neither admit nor deny the allegations contained in Paragraph thirty-eight of the Plaintiff's Complaint and leave the plaintiff to her proofs.

THE PARTIES

39. Defendants neither admit nor deny the allegations contained in Paragraph thirty-nine of the Plaintiff's Complaint and leave the plaintiff to her proofs.
40. Defendants neither admit nor deny the allegations contained in Paragraph forty of the Plaintiff's Complaint and leave the plaintiff to her proofs.
41. Defendants neither admit nor deny the allegations contained in Paragraph forty-one of the Plaintiff's Complaint and leave the plaintiff to her proofs.
42. Defendants admit the allegations contained in Paragraph forty-two of Plaintiff's Complaint.
43. Defendants admit the allegations contained in Paragraph forty-three of Plaintiff's Complaint.

ALLEGATIONS OF FACT

A. Defendants Traffick C.G.B. to the United States from Cameroon

44. Defendants neither admit nor deny the allegations contained in Paragraph forty-four of the Plaintiff's Complaint and leave the plaintiff to her proofs.
45. Defendants neither admit nor deny the allegations contained in Paragraph forty-five of the Plaintiff's Complaint and leave the plaintiff to her proofs.

46. Defendants neither admit nor deny the allegations contained in Paragraph forty-six of the Plaintiff's Complaint and leave the plaintiff to her proofs.
47. Defendants neither admit nor deny the allegations contained in Paragraph forty-seven of the Plaintiff's Complaint and leave the plaintiff to her proofs.
48. Defendants neither admit nor deny the allegations contained in Paragraph forty-eight of the Plaintiff's Complaint and leave the plaintiff to her proofs.
49. Defendants neither admit nor deny the allegations contained in Paragraph forty-nine of the Plaintiff's Complaint and leave the plaintiff to her proofs.
50. Defendants neither admit nor deny the allegations contained in Paragraph fifty of the Plaintiff's Complaint and leave the plaintiff to her proofs.
51. Defendants admit the allegations contained in Paragraph fifty-one of the Plaintiff's Complaint.
52. Defendants admit the allegations contained in Paragraph fifty-two of the Plaintiff's Complaint.
53. Defendants deny the allegations contained in Paragraph fifty-three of the Plaintiff's Complaint.
54. Defendants deny the allegations contained in Paragraph fifty-four of the Plaintiff's Complaint.
55. Defendants deny the allegations contained in Paragraph fifty-five of the Plaintiff's Complaint.
56. Defendants deny the allegations contained in Paragraph fifty-six of the Plaintiff's Complaint.

57. Defendants deny the allegations contained in Paragraph fifty-seven of the Plaintiff's Complaint.
58. Defendants deny the allegations contained in Paragraph fifty-eight of the Plaintiff's Complaint.
59. Defendants admit the allegations contained in Paragraph fifty-nine of the Plaintiff's Complaint and leave the plaintiff to her proofs.
60. Defendants neither admit nor deny the allegations contained in Paragraph sixty of the Plaintiff's Complaint and leave the plaintiff to her proofs.
61. Defendants deny the allegations contained in Paragraph sixty-one of the Plaintiff's Complaint.
62. Defendants deny the allegations contained in Paragraph sixty-two of the Plaintiff's Complaint.
63. Defendants neither admit nor deny the allegations contained in Paragraph sixty-three of the Plaintiff's Complaint and leave the plaintiff to her proofs.

B. C.G.B. Arrives in the United States

64. Defendants neither admit nor deny the allegations contained in Paragraph sixty-four of the Plaintiff's Complaint and leave the plaintiff to her proofs.
65. Defendants admit the allegations contained in Paragraph sixty-five of the Plaintiff's Complaint.
66. Defendants admit the allegations contained in Paragraph sixty-six of the Plaintiff's Complaint.
67. Defendants deny the allegations contained in Paragraph sixty-seven of the Plaintiff's Complaint.

68. Defendants deny the allegations contained in Paragraph sixty-eight of the Plaintiff's Complaint.

**C. Defendants Force C.G.B. to Work Excessive Hours as a Domestic Servant
and Pay her Meager Wages**

69. Defendants deny the allegations contained in Paragraph sixty-nine of the Plaintiff's Complaint.
70. Defendants deny the allegations contained in Paragraph seventy of the Plaintiff's Complaint.
71. Defendants deny the allegations contained in Paragraph seventy-one of the Plaintiff's Complaint.
72. Defendants deny the allegations contained in Paragraph seventy-two of the Plaintiff's Complaint.
73. Defendants deny the allegations contained in Paragraph seventy-three of the Plaintiff's Complaint.
74. Defendants deny the allegations contained in Paragraph seventy-four of the Plaintiff's Complaint.
75. Defendants deny the allegations contained in Paragraph seventy-five of the Plaintiff's Complaint.
76. Defendants deny the allegations contained in Paragraph seventy-six of the Plaintiff's Complaint.
77. Defendants deny the allegations contained in Paragraph seventy-seven of the Plaintiff's Complaint.

D. C.G.B.'s Living Conditions and Medical Care

78. Defendants deny the allegations contained in Paragraph seventy-eight of the Plaintiff's Complaint.
79. Defendants deny the allegations contained in Paragraph seventy-nine of the Plaintiff's Complaint.
80. Defendants deny the allegations contained in Paragraph eighty of the Plaintiff's Complaint.
81. Defendants deny the allegations contained in Paragraph eighty-one of the Plaintiff's Complaint.
82. Defendants deny the allegations contained in Paragraph eighty-two of the Plaintiff's Complaint.
83. Defendants deny the allegations contained in Paragraph eighty-three of the Plaintiff's Complaint.
84. Defendants deny the allegations contained in Paragraph eighty-four of the Plaintiff's Complaint.

**E. Defendants' Premise to Obtain Permanent Legal Status for C.G.B. turns
out to be a Lie**

85. Defendants deny the allegations contained in Paragraph eighty-five of the Plaintiff's Complaint.
86. Defendants deny the allegations contained in Paragraph eighty-six of the Plaintiff's Complaint.
87. Defendants deny the allegations contained in Paragraph eighty-seven of the Plaintiff's Complaint.

88. Defendants deny the allegations contained in Paragraph eighty-eight of the Plaintiff's Complaint.
89. Defendants deny the allegations contained in Paragraph eighty-nine of Plaintiff's Complaint.
90. Defendants deny the allegations contained in Paragraph ninety of Plaintiff's Complaint.
91. Defendants deny the allegations contained in Paragraph ninety-one of Plaintiff's Complaint.
92. Defendants deny the allegations contained in Paragraph ninety-two of Plaintiff's Complaint.
93. Defendants deny the allegations contained in Paragraph ninety-three of Plaintiff's Complaint.

F. Defendants Isolate C.G.B. in their Alpine, New Jersey Home

94. Defendants deny the allegations contained in Paragraph ninety-four of Plaintiff's Complaint.
95. Defendants deny the allegations contained in Paragraph ninety-five of Plaintiff's Complaint.
96. Defendants deny the allegations contained in Paragraph ninety-six of Plaintiff's Complaint.
97. Defendants deny the allegations contained in Paragraph ninety-seven of Plaintiff's Complaint.
98. Defendants deny the allegations contained in Paragraph ninety-eight of Plaintiff's Complaint.

99. Defendants deny the allegations contained in Paragraph ninety-nine of Plaintiff's Complaint.
100. Defendants deny the allegations contained in Paragraph 100 of the Plaintiff's Complaint.
101. Defendants deny the allegations contained in Paragraph 101 of Plaintiff's Complaint.
102. Defendants deny the allegations contained in Paragraph 102 of Plaintiff's Complaint.
103. Defendants neither admit nor deny the allegations contained in Paragraph 103 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
104. Defendants deny the allegations contained in Paragraph 104 of Plaintiff's Complaint.
105. Defendants deny the allegations contained in Paragraph 105 of Plaintiff's Complaint.
106. Defendants deny the allegations contained in Paragraph 106 of Plaintiff's Complaint.

G. C.G.B. is Abandoned by Defendants in Newark, New Jersey

107. Defendants deny the allegations contained in Paragraph 107 of the Plaintiff's Complaint.
108. Defendants deny the allegations contained in Paragraph 108 of the Plaintiff's Complaint.
109. Defendants deny the allegations contained in Paragraph 109 of Plaintiff's Complaint.

110. Defendants deny the allegations contained in Paragraph 110 of Plaintiff's Complaint.
111. Defendants neither admit nor deny the allegations contained in Paragraph 111 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
112. Defendants neither admit nor deny the allegations contained in Paragraph 112 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
113. Defendants deny the allegations contained in Paragraph 113 of Plaintiff's Complaint.
114. Defendants neither admit nor deny the allegations contained in Paragraph 114 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
115. Defendants neither admit nor deny the allegations contained in Paragraph 115 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
116. Defendants deny the allegations contained in Paragraph 116 of the Plaintiff's Complaint.
117. Defendants deny the allegations contained in Paragraph 117 of the Plaintiff's Complaint.
118. Defendants deny the allegations contained in Paragraph 118 of the Plaintiff's Complaint.
119. Defendants deny the allegations contained in Paragraph 119 of the Plaintiff's Complaint.
120. Defendants deny the allegations contained in Paragraph 120 of the Plaintiff's Complaint.

121. Defendants neither admit nor deny the allegations contained in Paragraph 121 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
122. Defendants neither admit nor deny the allegations contained in Paragraph 122 of the Plaintiff's Complaint and leave the plaintiff to her proofs.

H. Prolonged Emotional and Psychological Harm Suffered by C.G.B.

123. Defendants deny the allegations contained in Paragraph 123 of the Plaintiff's Complaint.
124. Defendants neither admit nor deny the allegations contained in Paragraph 124 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
125. Defendants neither admit nor deny the allegations contained in Paragraph 125 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
126. Defendants neither admit nor deny the allegations contained in Paragraph 126 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
127. Defendants neither admit nor deny the allegations contained in Paragraph 127 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
128. Defendants deny the allegations contained in Paragraph 128 of the Plaintiff's Complaint.
129. Defendants neither admit nor deny the allegations contained in Paragraph 129 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
130. Defendants neither admit nor deny the allegations contained in Paragraph 130 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
131. Defendants deny the allegations contained in Paragraph 131 of the Plaintiff's Complaint.

CLAIMS FOR RELIEF

COUNT I

(Forced Labor in Violation of the Victims of Trafficking and Violence

Protection Act of 2000 (“TVPA”), 18 U.S.C. 1589, 1595)

(Against All Defendants)

132. Defendants repeat their answers set forth in paragraphs 1 through 131 above as if fully set forth at length herein.
133. Defendants neither admit nor deny the allegations contained in Paragraph 133 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
134. Defendants deny the allegations contained in Paragraph 134 of Plaintiff's Complaint.
135. Defendants deny the allegations contained in Paragraph 135 of Plaintiff's Complaint.
136. Defendants deny the allegations contained in Paragraph 136 of Plaintiff's Complaint.
137. Defendants deny the allegations contained in Paragraph 137 of Plaintiff's Complaint.

COUNT II

(Trafficking with Respect to Peonage, Slavery, Involuntary Servitude or

Forced Labor in Violation of the TVPA, 18 U.S.C. 1590, 1595)

(Against all Defendants)

138. Defendants repeat their answers set forth in paragraphs 1 through 137 above as if fully set forth at length herein.

139. Defendants neither admit nor deny the allegations contained in Paragraph 139 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
140. Defendants deny the allegations contained in Paragraph 140 of Plaintiff's Complaint.
141. Defendants deny the allegations contained in Paragraph 141 of Plaintiff's Complaint.
142. Defendants deny the allegations contained in Paragraph 142 of Plaintiff's Complaint.
143. Defendants deny the allegations contained in Paragraph 143 of Plaintiff's Complaint.

COUNTY III

New Jersey Human Trafficking Prevention, Protection, and Treatment Act,

N.J.S. 2C:13-8.1

(Against All Defendants)

144. Defendants repeat their answers set forth in paragraphs 1 through 143 above as if fully set forth at length herein.
145. Defendants deny the allegations contained in Paragraph 145 of Plaintiff's Complaint.
146. Defendants deny the allegations contained in Paragraph 146 of Plaintiff's Complaint.
147. Defendants deny the allegations contained in Paragraph 147 of Plaintiff's Complaint.

148. Defendants deny the allegations contained in Paragraph 148 of Plaintiff's Complaint.
149. Defendants deny the allegations contained in Paragraph 149 of Plaintiff's Complaint.
150. Defendants deny the allegations contained in Paragraph 150 of Plaintiff's Complaint.

COUNT IV

(Failure to Pay Federal Minimum Wage in Violation of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. 206,216)
(Against All Defendants)

151. Defendants repeat their answers set forth in paragraphs 1 through 151 above as if fully set forth at length herein.
152. Defendants neither admit nor deny the allegations contained in Paragraph 152 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
153. Defendants neither admit nor deny the allegations contained in Paragraph 153 of the Plaintiff's Complaint and leave the plaintiff to her proofs.
154. Defendants deny the allegations contained in Paragraph 154 of Plaintiff's Complaint.
155. Defendants deny the allegations contained in Paragraph 155 of Plaintiff's Complaint.
156. Defendants deny the allegations contained in Paragraph 156 of Plaintiff's Complaint.

157. Defendants deny the allegations contained in Paragraph 157 of Plaintiff's Complaint.
158. Defendants deny the allegations contained in Paragraph 158 of Plaintiff's Complaint.
159. Defendants deny the allegations contained in Paragraph 159 of Plaintiff's Complaint.

COUNT V

(Failure to Pay Minimum Wage in Violation of the New Jersey Wage and Hour Law N.J.S.A. 34:11-56a et seq.
(Against All Defendants)

160. Defendants repeat their answers set forth in paragraphs 1 through 159 above as if fully set forth at length herein.
161. Defendants deny the allegations contained in Paragraph 161 of Plaintiff's Complaint.
162. Defendants deny the allegations contained in Paragraph 162 of Plaintiff's Complaint.

COUNT VI

(Fraudulent Misrepresentation)
(Against Defendant Santa Lucia)

163. Defendants repeat their answers set forth in paragraphs 1 through 162 above as if fully set forth at length herein.
164. Defendants deny the allegations contained in Paragraph 164 of Plaintiff's Complaint.

165. Defendants deny the allegations contained in Paragraph 165 of Plaintiff's Complaint.
166. Defendants deny the allegations contained in Paragraph 166 of Plaintiff's Complaint.
167. Defendants deny the allegations contained in Paragraph 167 of Plaintiff's Complaint.
168. Defendants deny the allegations contained in Paragraph 168 of Plaintiff's Complaint.
169. Defendants deny the allegations contained in Paragraph 169 of Plaintiff's Complaint.
170. Defendants deny the allegations contained in Paragraph 170 of Plaintiff's Complaint.
171. Defendants deny the allegations contained in Paragraph 171 of Plaintiff's Complaint.
172. Defendants deny the allegations contained in Paragraph 172 of Plaintiff's Complaint.

COUNT VII

(False Imprisonment)

(Against All Defendants)

173. Defendants repeat their answers set forth in paragraphs 1 through 172 above as if fully set forth at length herein.
174. Defendants deny the allegations contained in Paragraph 174 of Plaintiff's Complaint.

175. Defendants deny the allegations contained in Paragraph 175 of Plaintiff's Complaint.
176. Defendants deny the allegations contained in Paragraph 176 of Plaintiff's Complaint.
177. Defendants deny the allegations contained in Paragraph 177 of Plaintiff's Complaint.
178. Defendants deny the allegations contained in Paragraph 178 of Plaintiff's Complaint.
179. Defendants deny the allegations contained in Paragraph 179 of Plaintiff's Complaint.
180. Defendants deny the allegations contained in Paragraph 180 of Plaintiff's Complaint.
181. Defendants deny the allegations contained in Paragraph 181 of Plaintiff's Complaint.
182. Defendants deny the allegations contained in Paragraph 182 of Plaintiff's Complaint.

COUNT VIII

(Punitive Damages/Special Damages)

(Against All Defendants)

183. Defendants repeat their answers set forth in paragraphs 1 through 182 above as if fully set forth at length herein.
184. Defendants deny the allegations contained in Paragraph 184 of Plaintiff's Complaint.

185. Defendants deny the allegations contained in Paragraph 185 of Plaintiff's Complaint.

186. Defendants deny the allegations contained in Paragraph 186 of Plaintiff's Complaint.

WHEREFORE, Defendants demand judgment dismissing Plaintiff's Complaint.

AFFIRMATIVE DEFENSES
FIRST AFFIRMATIVE DEFENSE

Plaintiff's Complaint fails to state a cause of action.

SECOND AFFIRMATIVE DEFENSE

The Defendants are not guilty of any misfeasance, malfeasance, or nonfeasance.

THIRD AFFIRMATIVE DEFENSE

The Complaint is barred by the doctrine of waiver.

FOURTH AFFIRMATIVE DEFENSE

The Complaint is barred by the doctrines of legal and equitable estoppel.

FIFTH AFFIRMATIVE DEFENSE

The Complaint is barred by the doctrine of unclean hands.

SIXTH AFFIRMATIVE DEFENSE

Defendants are not in violation of 18 U.S.C. 1589, 1595.

SEVENTH AFFIRMATIVE DEFENSE

Defendants are not in violation of 18 U.S.C. 206, 216.

EIGHTH AFFIRMATIVE DEFENSE

Defendants are not in violation of the Human Trafficking Prevention, Protection and Treatment Act, N.J.S. 2C:13-8.1.

NINTH AFFIRMATIVE DEFENSE

Defendants are not in violation of 29 U.S.C. 1590, 1595.

TENTH AFFIRMATIVE DEFENSE

Defendants are not in violation of N.J.S.A. 34:11-56a et seq.

ELEVENTH AFFIRMATIVE DEFENSE

Defendants have not engaged in fraudulent misrepresentation with the plaintiffs or any other individual or entity.

TWELFTH AFFIRMATIVE DEFENSE

Defendants have not falsely imprisoned plaintiff.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff is not entitled to punitive/special damages.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiff's complaint is frivolous.

PAUL J. GIBLIN, JR., LLC
By: _____
Paul J. Giblin, Jr., Esq.
Attorneys for Defendants

Dated: September 18, 2015

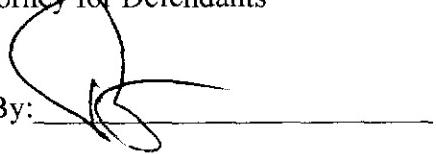
JURY DEMAND

Defendant hereby demands a trial by jury on all issues so triable.

PAUL J. GIBLIN, JR., LLC
Attorney for Defendants

Dated: September 18, 2015

By:


Paul J. Giblin, Jr.

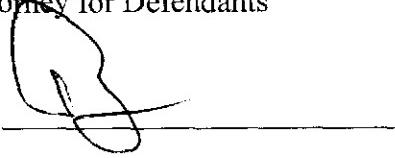
CERTIFICATION

I declare that I have read the above statements and that the statements are true to the best of my knowledge.

PAUL J. GIBLIN, JR., LLC
Attorney for Defendants

Dated: September 18, 2015

By:


Paul J. Giblin, Jr.